

**IN THE COURT OF COMMON PLEAS
CLERMONT COUNTY, OHIO**

| | | |
|------------------------------------|---|--------------------------------|
| CHRISTOPHER R. HICKS | : | |
| | : | CASE NO. 2024 CVH 1057 |
| Plaintiff, | : | |
| | : | JUDGE JONATHAN HEIN |
| v. | : | |
| | : | |
| CLERMONT COUNTY | : | VOLUNTARY DISMISSAL FOR |
| REPUBLICAN CENTRAL & | : | MOOTNESS OF CASE |
| EXECUTIVE COMMITTEE (CCRCC) | : | |
| et. al. | : | |
| | : | |
| Defendants | : | |
| | : | |
| | : | |
| | : | |

Now comes the Plaintiff, in a voluntary motion to dismiss, per Ohio Civil Rule 41 preceded by a brief memorandum.

MEMORANDUM

The Governor has sovereign authority in the appointment of Judges in the event of vacancies, under R.C. 107.08 and Article IV, Section 13 of the Constitution of the State of Ohio. The Governor delegates portions of his sovereign authority to County Republican Parties. Namely, by using them to collect and manage paperwork, as well as determine which individuals are assured interviews.

This case asked if the principles of *State ex rel. Cain v. Kay*, 38 Ohio St.2d 15, 18, 309 N.E.2d 860 (1974) should apply in such situations. In particular in Clermont County which engages the “full” Clermont County Republican Central Committee (CCRCC) in the

process.

Plaintiff argued, with the support and agreement of Executive Committee Chairman David Painter, that in Clermont County all and only Republican Central Committeemen who possess the qualifications of an elector should be able to participate in the recommendation meeting and vote (consistent with *Kay*).

The Governor and Jeff Corcoran, the Chair of the Clermont County Republican Central Committee, disagreed. Judge Hein clearly agreed with the Governor and Defendant Corcoran by his inaction in the matter, even to implement an agreement reached by the parties, for briefing and hearing, in an on-the-record teleconference with Judge Victor Haddad on Friday, August 2, 2024¹.

In a recent filing, the Governor, via the Attorney General's office, claims that the Plaintiff wandered "far outside the four corners of the complaint only to arrive at a dead end." The "dead end" is when the Governor could have easily resolved this matter in favor of credibility by simply agreeing with Executive Committee Chair David Painter and Plaintiff Chris Hicks, as the Governor set the "rules" within his delegation of authority. Judge Hein was clearly going to take no action prior to a scheduled vote, so the Governor was in the sole position to side with transparency and credibility.

The recommendation meeting took place on August 17, 2024. The results further

¹ Teleconference audio from the Court: <https://youtu.be/imaA8iDQrII>.

degrade credibility. 58% of the Clermont County Republican Central Committee members did not participate. Only 42% participated, which is a shockingly low percentage. A typical non-participant might say, “Why bother to participate? It is rigged.” These were the results:

| | Count | Percent of the CCRCC |
|-----------------------|-------|----------------------|
| Not present / no vote | 89 | 58% |
| Nathan Little | 51 | 33% |
| Katie Terpstra | 7 | 5% |
| Jessica Little | 6 | 4% |

So, on the heels of a resignation of a Judge who lied about exploiting a subordinate for sexual gratification in 2023 and was protected by Party insiders, until caught in a local park in 2024² the “recommendation process” looks as it does.

The Governor now faces an appointment to a Clermont County Municipal Court in disarray. Of the judges, one, Anita Bechmann, is undergoing heart surgery and will be out for the fourth quarter of 2024. One, Jason Nagel, is moving to Common Pleas Court. One, Jesse Kramig, is gone due to his unethical and immoral behavior. All while the citizens suffer and the Committee, at least the minority who participated at all, overwhelmingly recommend the candidate who has pledged loyalty to the Party, Nathan Little.

² Video: <https://youtu.be/GI9RGxXD3uc>

MOTION

Plaintiff, subject to Ohio Civil Rule 41, hereby moves to dismiss this case, with prejudice, as moot as a result of the recommendation meeting having taken place on August 17, 2024.

Respectfully submitted,

/s/Christopher R. Hicks
Christopher R. Hicks
444 Woodwick Ct., Cincinnati, OH 45255
513-289-4341 - chris@hickspub.com

CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2024, a copy of the foregoing was fax-filed with the clerk and was served via electronic mail upon the following:

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/s/Christopher R. Hicks
CHRISTOPHER R. HICKS
pro se Plaintiff

FAX FILING

1. Court: Clermont County Common Pleas
2. Case title: **2024 CVH 1057** Hicks, Christopher R. vs. Clermont County Republican Central Committee et al.
3. Case #: 2024 CVH 1057
4. Assigned Judge: Hein
5. Title of document: VOLUNTARY DISMISSAL
6. Date of fax: August 22, 2024 to 513-732-7050.
7. Transmitted from: 513-275-6883.
8. Pages: FOUR (4) + this cover page.
9. Filed by: Christopher Hicks, pro se. Mobile: 513-289-4341

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Fax Confirmation

Aug-22-2024 8:12AM

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